

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	Case No:	15-23249
Bernice Green)		
Debtors,)	Chapter:	Chapter 13
)		
)	Judge:	Jacqueline P. Cox

NOTICE OF MOTION

To: Bernice Green, 8811 S Elizabeth St, Chicago, IL, 60620

Tom Vaughn, 55 E. Monroe St # 3850, Chicago, IL, 60603

Office of the US Trustee, Dirksen Federal Court House, 219
South Dearborn Street, Room 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **July 11, 2016 at 9:00 a.m.**, I shall appear before the Honorable Judge Jacqueline P. Cox in 219 S. Dearborn St., Courtroom 680, Chicago, IL, 60604 and then and there present the attached **MOTION TO OBTAIN POSTPETITION CREDIT**, a copy of which is attached hereto.

By: /s/Kyle Dallmann
Kyle Dallmann

CERTIFICATE OF SERVICE

I, Kyle Dallmann, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, at 55 E. Monroe, Chicago, Illinois, before the hour of 5:30 p.m., on June 23, 2016.

/s/ Kyle Dallmann
Kyle Dallmann

Attorneys for the Debtors

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

Bank of America Mortgage
Bankruptcy Department
PO Box 9000
Getzville NY 14068-9000

Credit ONE BANK NA
Attn: Bankruptcy Dept.
Po Box 98875
Las Vegas NV 89193

Clerk, Chancery
11CH40944
50 W. Washington St., Room 802
Chicago IL 60602

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia PA 19101

Ira T. Nevel
Bankruptcy Dept.
175 N. Franklin, Suite 201
Chicago IL 60606

Kohls/Capone
Attn: Bankruptcy Dept.
N56 W 17000 Ridgewood Dr
Menomonee Falls WI 53051

CAP1/Carsn
Attn: Bankruptcy Dept.
26525 N Riverwoods Blvd
Mettawa IL 60045

Peoples Gas
Bankruptcy Department
130 E. Randolph Dr.
Chicago IL 60601-6207

Capital One
Attn: Bankruptcy Dept.
26525 N Riverwoods Blvd
Mettawa IL 60045

Tmobile
C/O Diversified Consultant
10550 Deerwood Park Blvd
Jacksonville FL 32256

Capital ONE AUTO Finan
Attn: Bankruptcy Dept.
3901 Dallas Pkwy
Plano TX 75093

Webbank/DFS
Attn: Bankruptcy Dept.
1 Dell Way
Round Rock TX 78682

CBNA
Attn: Bankruptcy Dept.
Po Box 6189
Sioux Falls SD 57117

CBNA
Attn: Bankruptcy Dept.
Po Box 6283
Sioux Falls SD 57117

Chase CARD
Attn: Bankruptcy Dept.
Po Box 15298
Wilmington DE 19850

City of Chicago Bureau Parking
Department of Revenue
PO Box 88292
Chicago IL 60680

City of Chicago Department of Finance

PO Box 6330
Chicago IL 60680

COMENITY BANK/Carsons
Attn: Bankruptcy Dept.
3100 Easton Square Pl
Columbus OH 43219

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MOTION TO OBTAIN POSTPETITION CREDIT

NOW COMES the Debtor, Ms. Bernice Green (the "Debtor"), by and through her attorneys, Geraci Law LLC, to present her **MOTION TO OBTAIN POSTPETITION CREDIT**, and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 07/07/2015.
3. The Debtor now seeks to purchase a used vehicle.
4. The Debtor's 2005 Cadillac CTS is no longer reliable. A replacement of the vehicle is necessary for the Debtor to commute to and from work.
5. The Debtor wishes to purchase a 2006 Cadillac STS at 72 payments of \$290.16 with an annual percentage rate of 21.99% for a total financed amount of \$11,551.00. See Exhibit A.
6. The Debtor's budget reflects that she can afford to make the payments on the proposed car loan, while retaining the dividend to the unsecured creditors. See Exhibit B for an amended budget.

WHEREFORE, the Debtor, Ms. Bernice Green, prays that this Court enter an order permitting her to obtain post-petition credit and for such further additional relief that this Court may deem just and proper.

/s/ Kyle Dallmann
Kyle Dallmann

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960